

TO: The Judges of the United States District Court for the Northern District of Georgia

1.

A civil action has been brought against the Defendant in the Superior Court of Fulton County, State of Georgia, by the above named Plaintiffs, said action being designated as Civil Action No. 2023CV381261. The Complaint seeks recovery of more than \$169,000.00.

2.

The Plaintiffs are now, and were at the commencement of this suit and at all times since, citizens and residents of the State of Georgia.

3.

Defendant Allstate Property & Casualty Insurance Company (hereinafter “Allstate”) is now, was at the commencement of this suit and at all times since, a corporation organized and existing under the laws of the State of Illinois, having its principal place of business in Northbrook, Illinois.

4.

Defendant Allstate attaches hereto a copy of the Summons and Complaint filed in the State Court of Gwinnett County, Georgia marked as Exhibit “A,” and a copy of Allstate Property & Casualty Insurance Company’s Answer to Plaintiffs’ Complaint marked as Exhibit “B”.

5.

Now, within thirty (30) days after receipt of the Summons and Complaint, Defendant files this its Notice of Removal of said action to this Court.

6.

This action is removable by reason of diversity of citizenship of the parties and the fact there is more than \$75,000.00 in controversy, exclusive of interest and costs.

WHEREFORE, the above-named Defendant Allstate Property & Casualty Insurance Company files this its Notice of Removal of said cause to this Court.

Respectfully submitted this 17<sup>th</sup> day of July, 2023.

WEBB, ZSCHUNKE, NEARY,  
& DIKEMAN, LLP

By: /s/ Marvin D. Dikeman  
MARVIN D. DIKEMAN  
Georgia State Bar No. 221760  
MELISSA C. MCMULLEN  
Georgia State Bar No. 187560

***Attorneys for Defendant Allstate Property  
& Casualty Insurance Company***

One Ameris Center, Suite 1210  
3490 Piedmont Road, N.E.  
Atlanta, GA 30305  
Telephone: 404.264.1080  
Telecopier: 404.264.4520  
[mdikeman@wznd.net](mailto:mdikeman@wznd.net)  
[mmcmullen@wznd.net](mailto:mmcmullen@wznd.net)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing **NOTICE OF REMOVAL** (prepared in Times New Roman 14 point font) with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys:

Victor Hawk, Esq.  
Shawn M. Merzlak, Esq.  
Tianna Bias, Esq.  
Hawk Law Group  
338 Telfair Street  
Augusta, GA 30901  
[vhawk@hawklawgroup.com](mailto:vhawk@hawklawgroup.com)  
[smerzlak@hawklawgroup.com](mailto:smerzlak@hawklawgroup.com)  
[tbias@hawklawgroup.com](mailto:tbias@hawklawgroup.com)

This 17<sup>th</sup> day of July, 2023.

By: /s/ Marvin D. Dikeman  
MARVIN D. DIKEMAN  
Georgia State Bar No. 221760

***Attorney for Defendant Allstate Property  
and Casualty Insurance Company***

**WEBB, ZSCHUNKE, NEARY & DIKEMAN, LLP**  
One Ameris Center, Suite 1210  
3490 Piedmont Road, N.E.  
Atlanta, GA 30305  
Telephone: 404.264.1080  
Telecopier: 404.264.4520  
[mdikeman@wznd.net](mailto:mdikeman@wznd.net)